

### **REMARKS**

Applicants would like to thank the Examiner for courtesies extended during the personal interview conducted on December 7, 2005. During the interview, the Examiner and Applicants' representative discussed relative voltage thresholds and relative switching times of the first and second switching devices with respect to the Leighton reference. However, no agreement was reached.

Claims 1-43 are now pending in the application. The Examiner is respectfully requested to reconsider and withdraw the rejections in view of the remarks contained herein.

### **REJECTION UNDER 35 U.S.C. § 102**

Claims 1, 2, 18, 20-21, 37 and 39-40 stand rejected under 35 U.S.C. § 102(e) as being anticipated by Leighton et al. (U.S. Pat. No. 6,813,110 B2). This rejection is respectfully traversed.

Leighton does not show, teach or suggest a control circuit that includes first switching devices and a write driver circuit that includes second switching devices, wherein the second switching devices have higher voltage thresholds than the first switching devices and wherein the second switching devices have slower switching times than the first switching devices.

As best understood by Applicant, there is no stated difference between the switches used in the control circuit of Leighton relative to the type of switches used in the write driver circuit. In rejecting the above-identified language of Claim 1, the Examiner relies upon Column 4, Lines 1-13 of Leighton, which state:

Specifically, as shown in FIGS. 4A-4D, the target write waveform is essentially decomposed into a boost (higher frequency) portion provided by current sources  $I_{A1}$  and  $I_{B1}$ , and a steady state (lower frequency) portion provided by current sources  $I_{A2}$  and  $I_{B2}$ . A greater percentage of the overshoot portion of the signal is assigned to the boost current source ( $I_{A1}$  and  $I_{B1}$ ), compared to the portion assigned to the steady state current source ( $I_{A2}$  and  $I_{B2}$ ). This is shown graphically in the disparate magnitudes of the overshoot portions and steady state portions of the waveforms shown in FIG. 4A-4D. As a result, the voltage at the bases of transistors  $Q_A$  and  $Q_B$  is level shifted toward (and potentially above) the positive supply voltage  $V_{CC}$ .

This section of Leighton does not state that the second switching devices have higher voltage thresholds than the first switching devices and/or that the second switching devices have slower switching times than the first switching devices.

For anticipation to be present under 35 U.S.C §102(b), there must be no difference between the claimed invention and the reference disclosure as viewed by one skilled in the field of the invention. *Scripps Clinic & Res. Found. V. Genentech, Inc.*, 18 USPQ.2d 1001 (Fed. Cir. 1991). All of the limitations of the claim must be inherent or expressly disclosed and must be arranged as in the claim. *Constant v. Advanced Micro-Devices, Inc.*, 7 USPQ.2d 1057 (Fed. Cir. 1988). Since the limitations relating to the switches are not disclosed by Leighton, the rejection under 102(e) cannot be maintained.

As described in one **exemplary** implementation in Applicant's disclosure at paragraph [0028], the low voltage switching device may include transistors that experience voltage stress above 1.8V while the high voltage switching devices may include transistors that experience voltage stress above 3.6V. The lower capacity/faster switching of the switching devices in the control circuit enables faster switching and increased data density. In contrast, Leighton states "[c]urrent sources  $I_{DC1}$  and  $I_{DC2}$

provide a DC current to ensure that transistors  $Q_C$  and  $Q_D$  are **always on**.” (Column 3, Lines 37-39; emphasis added). In other words, switching times of the transistors  $Q_C$  and  $Q_D$  relative to other transistors in the circuit are irrelevant because the transistors are always on.

Therefore, Claim 1 is allowable for at least these reasons. Claims 20 and 39 are allowable for at least similar reasons. The remaining Claims are either directly or indirectly dependent upon Claim 1, 20 and 39 and are therefore allowable for at least similar reasons or are indicated as allowable.

#### **ALLOWABLE SUBJECT MATTER**

Applicant would like to thank the Examiner for favorable consideration of Claims 3-17, 19, 22-36, 38 and 41-43, which were indicated as allowable if rewritten in independent form. Applicant will presently refrain from rewriting these Claims. Applicant reserves the right to amend these Claims into their originally allowable form at a later date if needed.

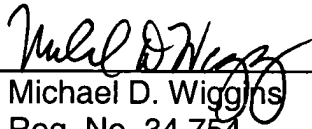
#### **CONCLUSION**

It is believed that all of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicant therefore respectfully requests that the Examiner reconsider and withdraw all presently outstanding rejections. It is believed that a full and complete response has been made to the outstanding Office Action and the present application is in condition for allowance. Thus, prompt and favorable consideration of this amendment is respectfully requested. If the Examiner

believes that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at (248) 641-1600.

Respectfully submitted,

Dated: January 5, 2006

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